



State of California—Health and Human Services Agency
California Department of Public Health

DRINKING WATER FIELD OPERATIONS BRANCH
50 D STREET, SUITE 200, SANTA ROSA, CA 95404
PHONE: (707) 576-2145 / FAX: (707) 576-2722
INTERNET ADDRESS: www.cdph.ca.gov



EDMUND G. BROWN JR.
Governor

May 27, 2014

Mr. Kit Larsen
Twin Creeks Mobile and RV Village
P.O. Box 11
Point Arena, CA 95468

**RE: Twin Creeks Mobile and RV Village
Citation No. 02-03-14C-003**

Dear Mr. Larsen:

Enclosed is a citation issued to Twin Creeks Mobile and RV Village (Water System). The citation is being issued because the Water System failed to comply with repeat and source bacteriological monitoring requirements during the month of October 2013.

The Citation consists of seven sections. The Determinations section describes the violation which resulted in the issuance of this Citation. The Directives section specifies what notifications are required, how and when to complete the notifications, and what required actions must be taken by the Water System to return to compliance.

Your Water System will be billed at the Department's current hourly rate of \$126.00 for the time spent issuing this Citation and any follow-up time required of Department staff to ensure compliance. The Water System will receive a bill from our Fee Billing Unit in Sacramento. If you have any questions regarding this matter, please contact Lori Hanson or myself at (707) 576-2145.

Sincerely,

Michelle Floyd Frederick, P.E.
District Engineer
Mendocino District

Enclosure: Citation No. 02-03-14C-003

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

Name of Public Water System: Twin Creeks Mobile and RV Village

Water System No: 1700580

To: Twin Creeks Mobile and RV Village
7990 Highway 29
Kelseyville, CA 95451

Issued: May 27, 2014

CITATION FOR NONCOMPLIANCE

With Total Coliform and Triggered Source Monitoring and Reporting

October 2013

Section 116650 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit or order issued thereunder.

The Division of Drinking Water and Environmental Management of the State of California Department of Public Health (Department) hereby issues a citation to the Twin Creeks Mobile and RV Village (System) for failure to comply with Title 22, California Code of Regulations (CCR) Sections 64423, 64423.1, 64424, and 64430.



APPLICABLE AUTHORITIES

Section 116650 of the CHSC states in relevant part:

- (a) If the department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).
- (e) The department may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.

California Code of Regulations, Section 64423 states in relevant part:

- (c) If any routine, repeat, or replacement sample is total coliform-positive, then the water supplier shall collect repeat samples in accordance with Section 64424.



1 California Code of Regulations, Section 64423.1 states in relevant part:

- 2 (c) Analytical results of all required samples collected for a system in a calendar
3 month shall be reported to the Department not later than the tenth day of the
4 following month.

5
6 California Code of Regulations, Section 64424 states in relevant part:

- 7 (a) If a routine sample is total-coliform positive, the water supplier shall collect a
8 repeat sample set as described in paragraph (a)(1) within 24 hours of being
9 notified of the positive result. The repeat samples shall all be collected within
10 the same 24 hour time period. A single service connection system may request
11 that the Department allow the collection of the repeat sample set over a four-
12 day period.

- 13 (1) For a water supplier that normally collects more than one routine
14 sample a month, a repeat sample set shall be at least three samples
15 for each total coliform-positive sample. For a water supplier that
16 normally collects one or fewer samples per month, a repeat sample set
17 shall be at least four samples for each total coliform-positive sample.

- 18
19 (d) If a public water system for which fewer than five routine samples/month are
20 collected has one or more total coliform –positive samples, the water supplier
21 shall collect at least five routine samples the following month.



1
2 California Code of Regulations, Section 64430 and Section 141.402(a)(1)
3 Title 40, Code of Federal Regulations published in November 8, 2006,
4 Federal Register (Vol.71, No. 216) states in relevant part:
5

6 A ground water system must conduct triggered source water monitoring if the
7 system is notified that a sample collected under California Code of Regulations,
8 Title 22, Sections 64422 and 64423 is total coliform-positive and the sample is not
9 invalidated under California Code of Regulations, Title 22, Section 64425.
10

11
12 **STATEMENT OF FACTS**

13 The System collected a routine bacteriological sample on October 10, 2013,
14 as required by Sections 64422 and 64423. The result of this sample was
15 total coliform-positive. Pursuant to Section 64424, the System is required to
16 collect a repeat sample set within 24 hours of being notified by the
17 laboratory of the positive result. Pursuant to Section 64430, the System is
18 required to collect a triggered source sample from each well in use at the
19 time the positive routine sample was collected.
20

21
22 As of the date of this citation, the Department has received only one repeat
23 bacteriological sample result from a sample collected on October 12, 2013
24 from the distribution system of the Twin Creeks Mobile and RV Village water
25 system. The Department has not received results from any triggered source
26 water samples collected from the System during October 2013.
27



- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17

2
3
4
5
6
7

8

9
10

- 3
4
5
6
7
8
9
20
21
22
23
24
25
26
27



- 1 b) Provide the notice by mail or direct delivery, **after it has been**
2 **completed in accordance with (a) above**, to each customer or
3 service connection served by the System by **June 27, 2014**. The
4 System may provide this as an attachment to their consumer
5 confidence report (CCR) in lieu of other direct delivery methods, if
6 desired.
7
8
9 c) Publish the notice contained in Attachment A, **after it has been**
10 **completed in accordance with (a) above**, in a local newspaper
11 of general circulation in the area served by the System (or weekly
12 newspaper if no daily paper is available) for one day. The
13 publication in a local newspaper must be completed by **June 27,**
14 **2014**.
15
16
17 d) Provide public notice for this violation in accordance with Section
18 64465(c), Title 22 or the CCR, which requires for each non-
19 English speaking group that exceeds 1,000 residents or 10% of
20 the residents in a community (whichever is less) that the public
21 notice contain information in the appropriate language(s)
22 regarding the importance of the notice, or contain a telephone
23 number or address where such residents may contact the water
24 system to receive a translated copy of the notice or to receive
25 assistance in the appropriate language.
26
27



1 3. Pursuant to Section 64430, Title 22 of the CCR and Section
2 141.402(a) Title 40, Code of Federal Regulations, Twin Creeks
3 Mobile and RV Village shall collect a raw water sample from the Well
4 01 source. The raw sample must be collected by **June 27, 2014** and
5 it must be analyzed for *E. coli* by a certified laboratory. The result
6 shall be submitted with the attached Compliance Certification form.
7

8
9 4. The System shall complete the attached Compliance Certification
10 form and return it to the Department within 10 days of the public
11 notice being given to system customers but in no case later than **July**
12 **7, 2014**. **A copy of the notice published in the newspaper, a copy**
13 **of the notice delivered to the customers, and a copy of the**
14 **laboratory results must be attached to the form.**
15

16
17 The Department reserves the right to make such modifications to this
18 Citation, as it may deem necessary to protect public health and safety.
19 Such modifications may be issued as amendments to this Citation and shall
20 be effective upon issuance. Nothing in this Citation relieves the System of
21 its obligation to meet the requirements of the California Safe Drinking Water
22 Act (CHSC, Division 104, Part 12, Chapter 4, commencing with Section
23 116270), or any regulation, standard, permit or order issued thereunder.
24
25
26
27



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

All submittals required by this Citation shall be submitted to the Department
at the following address:

Michelle Floyd Frederick, P.E.
Department of Public Health
Drinking Water Field Operations Branch
50 D Street, Suite 200
Santa Rosa, CA 95404

PARTIES BOUND

This Citation shall apply to and be binding upon the System, its officers,
directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The directives of this Citation are severable, and the System shall comply
with each provision thereof notwithstanding the effectiveness of any
provision.

1 **FURTHER ENFORCEMENT ACTION**

2 Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the
3 California Health and Safety Code authorizes the Department to: issue
4 additional citations with assessment of penalties if the System continues to
5 fail to correct a violation identified in a citation; take action to suspend or
6 revoke a permit that has been issued to a public water system if the System
7 has violated applicable law or regulations or has failed to comply with orders
8 of the Department; and petition the superior court to take various
9 enforcement measures against a public water system that has failed to
10 comply with orders of the Department. The Department does not waive any
11 further enforcement action by issuance of this citation.
12
13

14 Michelle J. Frederick

May 27, 2014

15 Michelle Floyd Frederick, P.E.

Date

16 Mendocino District Engineer

17 Drinking Water Field Operations Branch
18

19 Attachments

20 Certified Mail No.

7012 1010 0000 3983 8221

21
22 1700580/Compliance File #4
23 02-03-13C-003-1700580-24/LSH
24
25
26
27

